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Timothy J. Straub Managing Associate

timothy.straub@dentons.com D +1 212 768 6821

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August 13, 2020

VIA ECF

MEMO ENDORSED

The Honorable Andrew L. Carter, Jr. United States District Judge Southern District of New York 40 Foley Square, Courtroom 1306 New York, New York 1000

Williams v. Simmons Bedding Company, LLC.: Case No. 1:20-cv-1132-ALC Re:

Dear Judge Carter:

We represent defendant Simmons Bedding Company, LLC ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Pamela Williams, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from August 13, 2020 to September 27, 2020.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub Timothy J. Straub

All counsel of record (by ECF) CC:

> UNITED STATES DISTRICT JUDGE August 17, 2020

ION, ANDREW L. CARTER, JR.